



Order Filed on August 20, 2019  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

**RAS Citron, LLC**

130 Clinton Road, Lobby B, Suite 202

Fairfield, NJ 07004

Telephone: 973-575-0707

Facsimile: 973-404-8886

Authorized Agent for Secured Creditor Ditech Financial  
LLC

Aleisha Jennings 049302015

In Re:

In Re:

**John P. Conklin,**

**Debtor,**

**Melissa A. Conklin,**

**Joint Debtor.**

Case No.: 17-36011-MBK

Chapter: 13

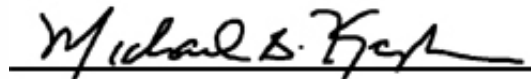
Hearing Date: August 14, 2019

Judge: Michael B. Kaplan

**AGREED ORDER RESOLVING SECURED CREDITOR'S MOTION FOR RELIEF  
FROM THE AUTOMATIC STAY**

The relief set forth on the following pages, numbered two (2) through three (3), is hereby  
ORDERED.

**DATED: August 20, 2019**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge

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Secured Creditor: Ditech Financial LLC

Secured Creditor's Counsel: Aleisha Jennings

Debtors' Counsel: Sadek and Cooper

Property Involved ("Collateral"): 63 GUILFORD PL, BURLINGTON TOWNSHIP, NJ 08016

Relief sought:           ■ Motion for relief from the automatic stay

For good cause shown, it is **ORDERED** that Applicant's Motion(s) is (are) resolved, subject to the following conditions:

1.       Status of post-petition arrearages:
  - The Debtor is overdue for 3 months from 05/01/2019 through 07/01/2019.
  - The Debtor is overdue for 3 payments 05/01/2019 through 07/01/2019 at \$1,230.14 per month.

Funds Held In Suspense \$59.22.

Total Arrearages Due \$ 3,631.20.
2.       Debtor must cure all post-petition arrearages, as follows:
  - Beginning on August 1, 2019, regular monthly mortgage payments shall continue to be made in the amount of \$1,230.14, subject to periodic adjustments.
  - Beginning on August 15, 2019, monthly cure payments shall be made in the amount of \$605.20 for 6 months, with the 6<sup>th</sup> and final payment to be made on or before January 15, 2019.
3.       Payments to the Secured Creditor shall be made to the following address(es):
  - Regular monthly payment:           Ditech Financial LLC  
  PO BOX 94710  
  Palatine, IL 60094-4710

■ Cure payment:

Ditech Financial LLC  
PO BOX 94710  
Palatine, IL 60094-4710

4. In the event of Default:

■ Should the Debtor(s) fail to make any of the above captioned payments, or if any regular monthly mortgage payment should become more than thirty (30) days late or if Debtor(s) fails to comply with any terms of this Consent Order, counsel shall file a Certification of Default with the Court. A copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and the Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ In the event the Debtor(s) convert(s) to a Chapter 7 during the pendency of this bankruptcy case, the Debtor(s) shall cure all arrears within ten (10) days from the date of conversion in order to bring the loan contractually current. Should the Debtors fail to bring the loan contractually current, counsel shall file a Certification of Default with the Court, a copy of the Certification shall be sent to the Chapter 7 and Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

■ This agreed order survives any loan modification agreed to and executed during the instant bankruptcy. If any regular mortgage payment due after the execution of a loan modification is more than thirty (30) days late, counsel shall file a Certification of Default with the Court a copy of the Certification shall be sent to the Chapter 13 Trustee, the Debtors, and Debtors' attorney and the court shall enter an Order granting relief from the Automatic Stay. Debtor shall pay \$200.00 for each notice of default issued by Secured Creditor as a result of the Debtor's failure to comply with this Consent Order.

5. Award of Attorneys' Fees:

■ The Applicant is awarded attorney fees of \$350.00 and costs of \$181.00.

The fees and costs are payable:

■ Through the Chapter 13 plan.

The undersigned hereby consent to the form and entry of the foregoing order.



Brad J. Sadek

*Attorney for Debtor(s)*

Date: 7/29/19

*/s/Aleisha C. Jennings*

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Aleisha Jennings

*Attorney for Secured Creditor*

Date: 7/30/19